



Natalie J. Kraner
Partner

One Lowenstein Drive
Roseland, New Jersey 07068

T: (973) 422-6722
F: (973) 422-6723
E: nkraner@lowenstein.com

June 14, 2024

VIA ECF

The Honorable Michael A. Shipp, U.S.D.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08068

**Re: *B.Y.C.C. v. United States*, No. 22-cv-06586 (MAS)
 J.A.L.C. v. United States, No. 22-cv-06587 (MAS)
 R.J.P. v. United States, No. 22-06588 (MAS)
 **Joint Request to Extend 60-Day Administrative Termination Another 60 Days to
 August 13, 2024****

Dear Judge Shipp:

This firm is pro bono counsel to Plaintiffs in the above referenced matters. On April 15, 2024, this Court issued 60-day orders in all three actions, administratively terminating the cases without prejudice while the parties work towards consummating settlements in all three actions. The 60-day period expires June 14, 2024. Because the parties need additional time to consummate the settlements, we respectfully request that the Court extend the 60-day period for another 60 days to August 13, 2024.

The Parties have agreed to the terms, conditions, and requirements of a settlement and have memorialized these terms and executed a Stipulation for Compromise Settlement and Release in each of the matters. However, additional steps need to be taken to finalize the settlements. *First*, because the plaintiffs in the *B.Y.C.C.* and *J.A.L.C.* matters include minors, the plaintiffs in those cases were required to file Motions for Court Approval of the Minors' Settlements. Those (unopposed) Motions were filed on June 7, 2024, and have been referred to Magistrate Judge Quinn. *Second*, Defendant United States must provide final approval of the Stipulation of Settlement in all three cases. Only after the Court and the Defendant provide the remaining approvals will the settlement funds be paid to the Plaintiffs.

With Defendant's consent, Plaintiffs respectfully request that this Court extend the 60-day administrative termination period for an additional 60 days to allow these remaining events to occur. This additional time should allow the Parties to obtain final approvals of the Stipulations of Settlement and should give Defendant time to pay the settlement amounts before the Court dismisses these actions.

Should the Court require any additional information or have any questions, please do not hesitate to contact us. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Catherine Weiss

Catherine Weiss

Pro bono Counsel for

J.A.L.C. Plaintiffs

/s/ Natalie J. Kraner

Natalie J. Kraner

Pro Bono Counsel for

B.Y.C.C. Plaintiffs

/s/ Jennifer Fiorica Delgado

Jennifer Fiorica Delgado

Pro Bono Counsel for

R.J.P. Plaintiffs